

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**

**MAR 02 2021**

**U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA**

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
RYAN HICKEY, )  
)  
Defendant. )

CAUSE NO.

**1 : 21 -cr- 0072 JRS -DML**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

18 U.S.C. § 1951

Interference with Commerce by Robbery

1. At all times material to this Indictment, Boyden's Southside Bakery, located at 3953 South Meridian Street, Indianapolis, Indiana, ("Boyden's") was engaged in the retail sale of articles and commodities that had moved in interstate commerce, to include food items and other merchandise.

2. On or about January 30, 2021, in the Southern District of Indiana, Indianapolis Division, Defendant RYAN HICKEY did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that Defendant RYAN HICKEY did attempt to unlawfully take and obtain U.S. currency in the custody, possession, and presence of one or more employees

of Boyden's, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employee or employees,

All in violation of Title 18, United States Code, Section 1951(a).

COUNT 2  
18 U.S.C. § 924(c)  
Discharging a Firearm During a Crime of Violence

On or about January 30, 2021, in the Southern District of Indiana, Indianapolis Division, Defendant RYAN HICKEY did knowingly discharge a firearm during and in relation to a crime of violence,

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby gives the defendant notice that the United States will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 924(d), if convicted of the offense set forth in Count 2 of this Indictment, the defendant shall forfeit to the United States "any firearm or ammunition involved in" the offense.

3. The property subject to forfeiture includes, but is not necessarily limited to, the following:

- a. One .45 caliber Smith & Wesson semiautomatic pistol; and
- b. Any ammunition associated with the offense.

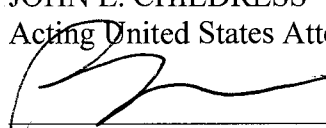
4. In addition, the United States may seek civil forfeiture of the property described above in paragraph 3 pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

JOHN E. CHILDRESS  
Acting United States Attorney

By:

  
\_\_\_\_\_  
Pamela S. Domash  
Assistant United States Attorney